

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Daiquan Jamel Weston
Debtor 1
Pinkie B. Britney Weston
Debtor 2

PennyMac Loan Services, LLC
Movant(s)

v.

Daiquan Jamel Weston
Pinkie B. Britney Weston
Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:24-BK-01046-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 52

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Daiquan Jamel Weston and Pinkie B. Britney Weston, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.

5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 5; therefore, it is denied.

6. Upon information and belief, the averment as stated in Paragraph 6 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 7; therefore, it is denied.

8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 8; therefore, it is denied.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 10; therefore, it is denied.

11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: January 6, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re:

Daiquan Jamel Weston

Debtor 1

Pinkie B. Britney Weston

Debtor 2

PennyMac Loan Services, LLC

Movant(s)

v.

Daiquan Jamel Weston

Pinkie B. Britney Weston

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:24-BK-01046-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 52

CERTIFICATE OF SERVICE

I hereby certify that on Monday, January 6, 2025, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Brent Lemon, Esquire
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire